

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO;
AMERICAN FEDERATION OF STATE, COUNTY
and MUNICIPAL EMPLOYEES, AFL-CIO; *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-01780-WHA

Judge William H. Alsup

DECLARATION OF STARLISHA ANDERSON

Pursuant to 28 U.S.C. § 1746, I, Starlisha Anderson, declare as follows:

1. I am employed as the Deputy Chief Human Capital Officer, Division of Human Resource Management (HRM), National Science Foundation (NSF).
2. I have held this position since October 4, 2025.
3. Previously, I was employed as the Acting Division Director and Acting Chief Human Capital Officer, HRM.
4. I held the Acting Division Director position from December 29, 2024 until October 3, 2025.
5. In both positions, I am responsible for oversight over the NSF portfolio of Human Resource (HR) services, policy, communications, and budget. This includes critical HR

functions such as staffing and recruitment, employee-management relations, compensation and benefits, executive services, and strategic human capital planning and accountability.

6. I am responsible for coordinating NSF's HR implementation of all personnel actions required by the *Order on Cross-Motions for Summary Judgment* dated September 12, 2025.

7. As I stated in my previous declaration dated May 5, 2025, on February 18, 2025, NSF terminated 84 probationary employees. NSF reinstated most of these employees by March 10, 2025. One employee was terminated for performance reasons, as I stated in my previous declaration dated May 5, 2025. Four employees voluntarily resigned instead of returning to duty.

8. NSF has updated all but the one terminated probationary employees' personnel files, including SF-50s, to reflect that their termination was not performance or conduct based. NSF has issued corrective notices to these employees. I have attached an exemplar of the corrective notice to my declaration as Attachment 1.

9. NSF no longer has access to the personnel files of the four employees who resigned after the February 18th termination. In accordance with the standard procedure for separated employees, their personnel files were transferred to the U.S. National Archives and Records Administration (NARA), National Personnel Records Center (NPRC), prior to the court issuing the order on September 12. Thus, NSF is unable to verify whether the files contain records of the termination. NSF will request retrieval of these files from the NRPC as soon as practicable after the end of the government funding lapse that began on October 1, 2025. NSF has issued corrective notices to these employees to their last record addresses and will send revised notices and/or correct their OPFs if necessary. I have attached an exemplar of the corrective notice to

my declaration as Attachment 2.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 10th day of November, 2025.

**STARLISHA J
ANDERSON**

Digitally signed by
STARLISHA J ANDERSON
Date: 2025.11.10 18:28:08
-05'00'

STARLISHA ANDERSON
Deputy Chief Human Capital Officer, HRM
National Science Foundation

Privileged & Confidential / Attorney Work Product

U.S. National Science Foundation
2415 Eisenhower Avenue
Alexandria, Virginia 22314

November [], 2025

[NAME OF EMPLOYEE]
[MAILING OR EMAIL ADDRESS OF EMPLOYEE]

Dear [Name of Employee]:

This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, the National Science Foundation informs you that you were not terminated on the basis of your personal performance.

As required by Paragraph 3 of that order, the National Science Foundation has updated your personnel file, which does not contain any records of the termination.

Sincerely,

s/ Starlisha Anderson

Deputy Chief Human Capital Officer,
Division of Human Resource Management
National Science Foundation

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U.S. National Science Foundation
2415 Eisenhower Avenue
Alexandria, Virginia 22314

November [], 2025

[NAME OF EMPLOYEE]
[MAILING OR EMAIL ADDRESS OF EMPLOYEE]

Dear [Name of Employee]:

This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, the National Science Foundation (NSF) informs you that you were not terminated on the basis of your personal performance.

NSF no longer has access to your personnel file; thus, NSF is unable to verify whether the file contains records of the termination. NSF will retrieve the file from the U.S. National Archives and Records Administration (NARA) and review it as soon as practicable. As required by Paragraph 3 of that order, NSF will update your personnel file, if necessary, to remove any records of the termination.

Sincerely,

s/ Starlisha Anderson

Deputy Chief Human Capital Officer,
Division of Human Resource Management
National Science Foundation